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DAIMLERCHRYSLER CORPORATION
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8 UNITED STATES DISTRICT COURT

9 NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION
10

11 CARLA CORTES, a minor, by and through her
Guardian ad Litem, ISABEL CORTES
12 GARCIA; ISABEL CORTES GARCIA; and
JUAN CARLOS GARCIA TORRES,

13 Plaintiffs,
14

15 v.

16 DAIMLERCHRYSLER CORPORATION, and
DOES ONE through ONE HUNDRED,

17 Defendants.
18

CASE NO. C-05-01012 CRB

**STIPULATION AND ~~PROPOSED~~
ORDER EXTENDING DATES FOR
EXPERT DISCLOSURE**

19 The parties, by and through their attorneys of record, hereby submit the following
20 Stipulation to continue the deadline for expert disclosure.

21 **REASON FOR REQUEST**

22 The parties have worked diligently to prepare this case for trial. Multiple vehicle
23 inspections have been conducted. The parties have engaged in extensive written discovery.
24 Numerous depositions have been taken, including the adult plaintiffs, the responding police and
25 firefighters, plaintiff Isabel Cortes' medical providers, several percipient witnesses, and Robert
26 Banta, DCC designated 30(b)(6) witness on the issue of, among other things, fuel system design.
27 The deposition of Richard Geeno, DCC's designated 30(b)(6) witness on the issues of drive train
28 design and durability, was scheduled to be taken on November 3, 2006. Unfortunately,

1 plaintiffs' counsel fell ill that morning and the deposition had to be rescheduled. It will now be
2 taken on December 11, 2006.

3 Initial expert disclosures are currently set for December 1, 2006. Rebuttal disclosure is
4 January 5, 2007. Due to the unanticipated and unavoidable continuance of Mr. Geeno's
5 deposition, the parties have agreed to continue the expert disclosure deadline to January 8, 2007
6 and the rebuttal disclosure deadline to January 29, 2007. This continuance will not impact other
7 current deadlines in this case. In addition, the parties have agreed to participate in a second
8 mediation session. The parties anticipate this second session will go forward the week of
9 December 4, 2006.¹

10 STIPULATION

11 For the reasons set forth above, the parties hereby agree to extend expert disclosure from
12 December 1, 2006 to January 8, 2007, and to extend rebuttal expert disclosure from January 5,
13 2007 to January 29, 2007.

14 IT IS SO STIPULATED.

15 DATED: November __, 2006 WALKUP, MELODIA, KELLY, WECHT & SCHOENBERGER

16
17 By: /s/ Douglas S. Saeltzer
DOUGLAS S. SAELTZER
WALKUP, MELODIA, KELLY, WECHT & SCHOENBERGER
18 Attorneys for Plaintiffs CARLA CORTES, a minor, by
19 and through her Guardian at Litem, ISABEL CORTES
CARLOS GARCIA TORRES

20
21
22 DATED: November __, 2006 SEDGWICK, DETERT, MORAN & ARNOLD

23
24 By: /s/ Dennis E. Raglin
DENNIS E. RAGLIN
25 SEDGWICK, DETERT, MORAN & ARNOLD
26 Attorneys for Defendant
DAIMLERCHRYSLER CORPORATION

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28 ¹ The initial mediation, held on March 28, 2006 (prior to the completion of much of the
discovery discussed above) was unsuccessful.

ORDER

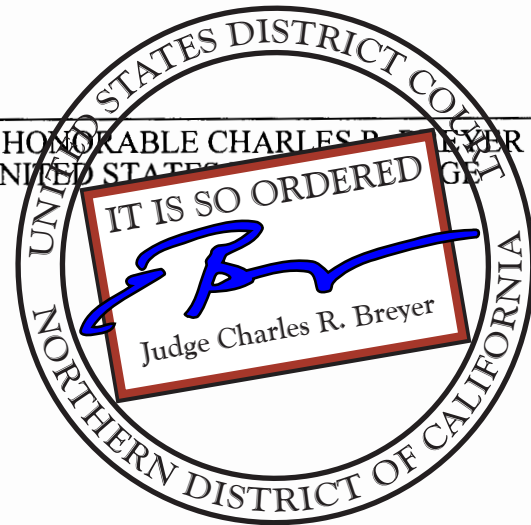
Pursuant to the Stipulation above, IT IS HEREBY ORDERED THAT the following dates are extended as set forth below:

1. Expert Disclosure: December 1, 2006 to January 8, 2007; and
2. Rebuttal Disclosure: January 5, 2007 to January 29, 2007.

IT IS SO ORDERED.

DATED: November 17, 2006

THE HONORABLE CHARLES R. BREYER
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA



Cortes v. DaimlerChrysler Corporation
U.S.D.C., Northern District of California, Case No. C-05-01012 CRB

PROOF OF SERVICE

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is Sedgwick, Detert, Moran & Arnold LLP, One Market Plaza, Steuart Tower, 8th Floor, San Francisco, California 94105. On November 15, 2006, I served the within document:

**STIPULATION AND PROPOSED ORDER
EXTENDING DATES FOR EXPERT DISCLOSURE**

- ☐ **FACSIMILE** – by transmitting via facsimile the document listed above to the fax number set forth on the attached Telecommunications Cover Page on this date before 5:00 p.m.
- ☒ **MAIL** – by placing the document listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at San Francisco, California addressed as set forth below.
- ☐ **OVERNIGHT COURIER** – by placing the document(s) listed above in a sealed envelope with shipping prepaid, and depositing in a collection box for next day delivery to the person(s) at the address(es) set forth below via .
- ☐ by causing **PERSONAL DELIVERY** by an agent of WORLDWIDE COURIER of the document(s) listed above to the person(s) at the address(es) set forth below.

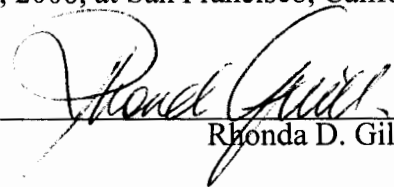
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Attorneys For Plaintiffs Cortes

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on November 15, 2006, at San Francisco, California.


Rhonda D. Gillis